Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**MGPI of Indiana, LLC**
Source Location:	**7 Ridge Avenue, Lawrenceburg, Indiana 47025**
County:	**Dearborn**
SIC Code:	**2085**
Permit Renewal No.:	**T029-32119-00005**
Permit Reviewer:	**Teresa Freeman**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from MGPI of Indiana, LLC relating to the operation of a distilled spirits production source. On July 16, 2012, MGPI of Indiana, LLC submitted an application to the OAQ requesting to renew its operating permit. (MGPI of Indiana, LLC was issued a Part 70 Operating Permit T029-24407-00005 on April 15, 2008.

Source Definition

Proximo Distillers Indiana, LLC owns a bottling plant (source ID # 029-00043) that was previously part of the same permit as the MGPI of Indiana, LLC distillery (source ID #029-00005). Some of the MGPI plant's production is bottled at the Proximo plant. IDEM, OAQ has examined whether these two plants are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

(1) the plants must be under common ownership or common control;

(2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

(3) the plants must be located on contiguous or adjacent properties.

The plants have separate ownership. MGPI of Indiana, LLC and Proximo Distillers Indiana, LLC are distinct corporations. There are no common controllers, common corporate officers or common directors between the two companies. The corporations are not subsidiaries of any common corporate parent or other common owner. Therefore no common ownership exists.

Where there is no common ownership, IDEM's Nonrule Policy Document Air-005 sets out two independent tests to determine if common control exists. The first test, the auxiliary activity test, determines whether one source performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:

- is a majority of the output of the auxiliary activity provided to the primary activity?

- can the auxiliary activity contract to provide it products/services to a third-party without the consent of the primary activity?

- can the primary activity assume control of the auxiliary activity under certain circumstances?

- is the auxiliary activity required to complete periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

The MGPI plant sends about 10% of its output to the Proximo plant for bottling. A pipeline from the MGPI plant sends the alcohol directly to the Proximo plant. The remainder of the MGPI plant's production is shipped out as bulk spirits. The Proximo plant is free to bottle spirits from other distilleries. The MGPI plant has no ability to assume control of the Proximo plant under any circumstances. The Proximo plant is not required to complete periodic reports to the MGPI plant. The Proximo plant does not send any output to the MGPI plant. More than 50% of the Proximo plant's bottling is done from alcohol it receives from other distilleries. The plants do not meet the first common control test.

The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied. Only 10% of the MGPI plant's output is bottled at the Proximo plant. Of all the bottling done at the Proximo plant, less than 50% is done from alcohol received from the MGPI plant. Therefore the second common control test is also not met. IDEM finds that the MGPI plant and the Proximo plant are not under common control. Since neither common ownership nor common control exists, the first part of the definition of major source is not met.

The Standard Industrial Classification Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at http://www.osha.gov/pls/imis/sic_manual.html on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. The MGPI plant has the two-digit SIC Code 20 for the Major Group Food and Kindred Products, which includes the four-digit SIC Code 2085 for Distilled and Blended Liquors. The Proximo plant has the two-digit SIC Code 51 for the Major Group Wholesale Trade – Nondurable Goods. The Proximo plant has the four-digit SIC Code 5182 Wine and Distilled Alcoholic Beverages, which includes plants that bottle alcohol.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. The MGPI plant sends about 10% of its output to the Proximo plant. The Proximo plant sends nothing to the MGPI plant. The Proximo plant does less than 50% of its bottling work using alcohol received from the MGPI plant. Since neither plant dedicates 50% or more of its output to the other plant, there is no support facility relationship. Since the plants do not have the same two-digit SIC Code or a support relationship, the second part of the major source definition is not met.

The last part of the definition is whether the plants are on contiguous or adjacent properties. The plants are located on contiguous properties that are separated only by a right-of-way for an Indiana state highway. The property boundaries of the plants share a common border under the right-of-way. Since the plants are located on contiguous properties, they meet the third element of the major source definition.

IDEM, OAQ finds that the MGPI plant and the Proximo plant do not meet all three parts of the major source definition and therefore the two plants are not part of the same major source.

Permitted Emission Units and Pollution Control Equipment

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) grain receiving and pneumatic conveyor, identified as EU-11, installed prior to 1950, equipped with a dust collector, exhausting to Stack S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.

(b) One (1) corn receiving and storage system, identified as EU-12, approved in 1997 for construction, consisting of the following equipment:

(1) One (1) unloading hopper, equipped with baghouse using fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.

(2) One (1) conveyor and bucket elevator, equipped with baghouse using fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.

(3) One (1) storage silo, equipped with baghouse using fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 75,000 bushels of corn.

(4) One (1) grain cleaner, equipped with baghouse using fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 26.6 tons of corn per hour.

(5) One (1) grain transport system, equipped with baghouse using fabric filters for particulate matter control, exhausting to Stack S-112, capacity: 26.6 tons of corn per hour.

(c) Seven (7) storage bins, collectively identified as EU-13, installed prior to 1950, equipped with baghouse using fabric filters for particulate matter control, exhausting inside, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.

(d) Six (6) hammermills and hopper, collectively identified as EU-14, installed prior to 1950, equipped with a baghouse for particulate matter control, exhausting inside through Stack S-104, capacity: 109,760 pounds of grain per hour, total.

(e) Three (3) multi-column stills and five (5) distillation columns, collectively identified as EU-20, installed prior to 1950, consisting of the following:

(1) One (1) spirits still (V-2), exhausting to Stack S-210, capacity: 583 proof gallons per hour,

(2) One (1) spirits still (V-3), exhausting to Stack S-210, capacity: 750 proof gallons per hour,

(3) One (1) spirits still (V-15), exhausting to Stack S-210, capacity: 3,750 proof gallons per hour;

(4) One (1) distillation column, exhausting to Stack S-211, and

(5) Four (4) unused distillation columns, exhausting to Stack S-211.

(f) EU-21, consisting of the following units:

(1) Three (3) open fermenters, installed prior to 1950, exhausting to Stack S-201, capacity: 25,300 gallons, each.

(2) Five (5) open fermenters, approved in 2004 for construction, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(3) Three (3) open fermenters, approved in 2005 for construction, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(4) Three (3) open fermenters, approved in 2006, for construction, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(g) Twenty-four (24) closed fermenters, collectively identified as EU-22, installed prior to 1950, equipped with one (1) ethanol scrubber, exhausting to Stack S-202, capacity: 55,000 gallons, each.

(h) Two (2) beer wells, identified as EU-23 and EU-24, installed prior to 1950, exhausting to Stacks S-203 and S-204 respectively, capacity: 38,886 and 102,098 gallons, respectively.

(i) Three (3) beer stills, collectively identified as EU-25, installed prior to 1950, exhausting to Stack S-205, consisting of the following:

(1) Still #25, capacity: 4,600 gallons per hour,

(2) Still #26, capacity: 14,600 gallons per hour; and

(3) Still #31, capacity: 12,000 gallons per hour.

(j) Two (2) column & kettles, collectively identified as EU-26, installed prior to 1950, exhausting to Stack S-206, capacity: 727 proof gallons per hour, each.

(k) Three (3) gin stills (#10, #22, and #23), collectively identified as EU-27, installed prior to 1950, exhausting to Stack S-207, capacity: 600 proof gallons per hour, each.

(l) One (1) doubler still, identified as EU-29, installed prior to 1950, exhausting to Stack S-209, capacity: 672 proof gallons per hour.

(m) Four (4) paddle screens, collectively identified as EU-31, installed prior to 1950, exhausting to Stack S-301, capacity: 56,000 pounds per hour, each.

(n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, collectively identified as EU-32, installed prior to 1950, consisting of the following:

(1) Two (2) rotary dryers, exhausting to Stacks S-305 and S-306, each equipped with a wet scrubber, capacity: 25,500 pounds of grain per hour, each,

(2) Three (3) rotary dryers, exhausting to Stacks S-307 through S-309, each controlled by a wet scrubber, capacity: 14,500 pounds of grain per hour, each; and

(3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausting to Stack S- 310, capacity: 13,000 pounds of grain per hour.

(o) Three (3) conveyors, collectively identified as EU-33, installed prior to 1950, exhausting to Stacks S-302 through S-304, capacity: 38,000 pounds of grain per hour, each.

(p) One (1) DDG (Distillers Dried Grain) loadout system, approved in 1997 for construction, consisting of the following:

(1) Two (2) storage silos, and two (2) surge hoppers, collectively identified as EU-34, equipped with two (2) dust collectors, exhausting to Stacks S-341 through S-344, capacity: 13,100 cubic feet, total for the two (2) storage silos, each and 14,000 pounds of grain per hour, each, for the two (2) surge hoppers.

(2) One (1) air transport system and scale to the rail car loading area, identified as EU-35, controlled by a dust collector, exhausting to Stack S-350, capacity: 14,000 pounds of grain per hour.

(3) One (1) air transport system and scale to the truck loading area, identified as EU-36, controlled by a dust collector, exhausting to Stack S-360, capacity: 14,000 pounds of grain per hour.

(4) One (1) rail car loader, identified as EU-37, exhausting to Stack S-370, capacity: 14,000 pounds of grain per hour.

(5) One (1) truck loader, identified as EU-38, exhausting to Stack S-380, capacity: 14,000 pounds of grain per hour.

(q) One (1) wine room, identified as EU-41, consisting of forty-three (43) organic liquid storage tanks, installed prior to 1950, exhausting to Stack S-410, capacity: 524,504 gallons of ethanol, total and a throughput of 32,000,000 proof gallons per year, total, consisting of the following:

(1) Thirty-five (35) organic liquid storage tanks, installed prior to 1950, capacity: 467,518 gallons of ethanol, total.

(2) Eight (8) organic liquid storage tanks, installed in 1988, capacity: 56,986 gallons of ethanol, total.

(r) One (1) tank farm, identified as EU-42, consisting of nine (9) organic liquid storage tanks, installed prior to 1950, exhausting to Stack S-420, capacity: 750,000 gallons of ethanol, each.

(s) EU-43, consisting of the following units:

(1) One (1) Bldg 88, consisting of twenty-seven (27) organic liquid storage tanks, installed in 1989, exhausting to Stack S-430, capacity: 489,250 gallons of ethanol, total.

(2) One (1) rum handling area installed in 1997, exhausting to the atmosphere, capacity: 3,501,429 gallons of rum.

(t) One (1) mini tank farm, identified as EU-45, consisting of eight (8) tanks:

(1) Seven organic liquid storage (7) tanks, installed in 1989, exhausting to Stack S-435, capacity: 779,800 gallons of ethanol, total.

(2) One (1) organic liquid storage tank, installed in 1994, capacity: 3,500 gallons of ethanol.

(u) One (1) barrel filling and emptying operation, identified as EU-61, installed prior to 1950, exhausting to Stack S-610, with a throughput capacity of 13,000,000 proof gallons and 12,775,000 proof gallons of whiskey and gin per year, respectively, and a maximum capacity of 29,700 gallons of whiskey and gin per hour .

(v) One (1) Warehouse C, identified as EU-71, installed prior to 1950, exhausting to Vent 701, capacity: 69,306 barrels.

(w) One (1) Warehouse E, identified as EU-72, installed prior to 1950, exhausting to Vent 702, capacity: 101,032 barrels.

(x) One (1) Warehouse G, identified as EU-73, installed prior to 1950, exhausting to Vent 703, capacity: 84,097 barrels.

(y) One (1) Warehouse J & M, identified as EU-74, installed prior to 1950, exhausting to Vent 704, capacity: 100,000 barrels.

(z) One (1) Warehouse L, identified as EU-75, installed prior to 1950, exhausting to Vent 705, capacity: 93,438 barrels.

(aa) One (1) Warehouse N, identified as EU-76, installed prior to 1950, exhausting to Vent 706, capacity: 93,405 barrels.

(bb) One (1) steam boiler, identified as EU-96, approved in 1977 for construction, using natural gas and exhausting to Stack S-906, heat input capacity: 244 million British thermal units per hour.

Under 40 CFR 63, Subpart DDDDD, this facility is an affected unit.

(cc) One (1) natural gas fired steam boiler, identified as EU-97, using #2 fuel oil as back-up, installed in approved in 1992 for construction, exhausting to Stack S-907, heat input capacity: 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using #2 fuel oil.

Under 40 CFR 60, Subpart Dc, this facility is considered an industrial, institutional, or commercial boiler. Under 40 CFR 63, Subpart DDDDD, this facility is an affected unit.

(dd) One (1) loading rack system, consisting of four (4) rail car and four (4) truck loading racks, identified as EU-46, installed in 1989, exhausting to the atmosphere, capacity: 31,000,000 gallons of ethanol per year.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

(a) One (1) regauge tank area, identified as EU-44, consisting of fifty-six (56) tanks, installed in 1960, exhausting to Stack S-440, capacity: 592,362 gallons of ethanol, total.

(b) One (1) bottling tank room, identified as EU-51, consisting of forty-five (45) organic liquid storage tanks, with a total capacity of 452,000 gallons of ethanol, consisting of the following:

(1) Forty-one (41) organic liquid storage tanks, installed in 1969, exhausting to Stack S-510 and

(2) Four (4) organic liquid storage tanks, installed in 2003, exhausting to Stack S-510.

(c) Seven (7) bottling lines, and one (1) 50-ml bottling line, collectively identified as EU-52, installed prior to 1950 and modified in 2003, exhausting to Stack S-520, capacity: 452,000 gallons of ethanol.

(d) One (1) cooler operation, identified as EU-53, installed prior to 1988, exhausting to Stack S-530, capacity: 2,187 cases per hour.

(e) Three (3) natural gas fired boilers with a heat input of capacity of 4.2 MMBtu/hr each.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(1) One (1) diesel fuel tank with storage capacity of 200 gallons.

(b) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, constructed before 1970.

(d) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38˚C (100˚F) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20˚C (68˚F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(e) Closed loop heating and cooling systems.

(f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(g) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

(h) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(k) Asbestos abatement projects regulated by 326 IAC 14-10.

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower.

(1) One (1) Diesel-fired emergency generator, with a maximum capacity of 1600 hp and manufactured in 1999. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(o) Other emergency equipment as follows: stationary fire pumps.

(1) One (1) Diesel-fired emergency fire water pump with a maximum capacity of 235 horsepower and manufactured in 1996. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(p) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

(q) Filter or coalescer media changeout.

(r) Vents from ash transport systems not operated at positive pressure. (not specifically regulated)

(s) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(t) Activities or categories of activities with individual HAP emissions:

(1) The Heads Still, a part of the distillation process, emits trace amounts of acetaldehyde, a listed HAP. Emissions occur inside the Still House.

(u) A gasoline and fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(1) One (1) gasoline tank, with a maximum capacity of 200 gallons and a monthly throughput less than 100 gallons.

(v) Activities associated with emergencies, including natural gas reciprocating engines not exceeding 16,000 horsepower.

(1) One (1) Natural gas-fired emergency generator, with a maximum capacity of 0.121 MMBtu/hr and installed in 2005. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

Existing Approvals

Since the issuance of the Part 70 Operating Permit No. T 029-24407-00005 on April 15, 2008, the source has constructed or has been operating under the following approvals as well:

(a) Administrative Amendment 029-26489-00005, issued on June 17, 2008;

(b) Administrative Amendment 029-31206-00005, issued on December 28, 2011;

(c) Administrative Amendment 029-32386-00005, issued on ~~November 27~~December 12, 2012; and ,

(d) Administrative Amendment 029-33099-00005, issued on May 31, 2013.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Dearborn County.

Pollutant	Designation
SO_2	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Nonattainment effective July 20, 2012, for the 2008 8-hour ozone standard for Lawrenceburg Township. Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard for the remainder of the county.[1]
$PM_{2.5}$	Attainment effective December 23, 2011, for the annual PM2.5 standard for Lawrenceburg Township. Unclassifiable or attainment effective April 5, 2005, for the annual PM2.5 standard for the remainder of the county.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was	

Pollutant	Designation
revoked effective June 15, 2005.	

(a) Ozone Standards
U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Dearborn County Lawrenceburg Township as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM, does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) $PM_{2.5}$
County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$, NO_X, and SO_2 emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Dearborn County has been classified as attainment or unclassifiable in Indiana for PM_{10}, SO_2, NO_X, CO, and Lead.. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	809
PM_{10}	815
$PM_{2.5}$	263

Unrestricted Potential Emissions	
Pollutant	Tons/year
SO_2	63
VOC	3660
CO	108
NO_x	333
GHGs as CO_2e 11/29/09	157,829
GHGs as CO_2e 11/30/13	157,808
Single HAP- Acetaldehyde	60.2
Total HAP	78.6

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, PM2,5, VOC and NOx is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is equal to or greater than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of this Pemitting Action (tons/year)										
	PM	PM10*	PM2.5**	SO2	NOx	VOC	CO	**GHGs 10/30/09**	GHGs **11/29/13**	Total HAPs	Acetaldehyde
One (1) pneumatic conveyor, (EU-11)	189.2	189.2	16.1	-	-	-	-	**-**	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of this Pemitting Action (tons/year)										
	PM	PM10*	PM2.5**	SO2	NOx	VOC	CO	**GHGs 10/30/09**	GHGs **11/29/13**	Total HAPs	Acetaldehyde
One (1) corn receiving and storage system, (EU-12)	5.26	5.26	5.26	-	-	-	-	-	-	-	-
One (1) grain transport system, identified as EU-12 (Stack S-112)	0.96	0.96	0.96	-	-	-	-	-	-	-	-
Seven (7) storage bins, collectively identified as EU-13	0.96	0.96	0.96	-	-	-	-	-	-	-	-
Six (6) hammermills, collectively identified as EU-14	90.1	90.1	7.66	-	-	-	-	-	-	-	-
EU-21, which consists of fourteen (14) open fermenters	-	-	-	-	-	7.81	-	-		0.4	0.03
DDGS Storage (EU-34)	0.60	0.60	0.60	-	-	-	-	-	-	-	-
DDGS Rail/Truck Loadout (EU-35/EU-36)	1.27	1.27	1.27	-	-	-	-	-	-	-	-
DDGS Rail/Truck Loader(EU-37/EU-38)	5.48	5.48	5.48	-	-	-	-	-	-	-	-
Twenty-four (24) closed fermenters, collectively (EU-22)	-	-	-	-	-	57.8	-	-	-	0.26	0.23
Two (2) beer wells, EU-23 and EU-24	-	-	-	-	-	12.5	-	-	-	-	-
Distillation (EU-20 and EU-25 through EU-29)	-	-	-	-	-	92.9	-	-	-	3.43	2.81
Four (4) paddle screens, identified as EU-31 and three (3) conveyors, (EU-33)	-	-	-	-	-	440	-	-	-	2.00	1.77
Five (5) rotary dryers, one (1) cooler, and one (1) transport system, collectively (EU-32)	201	201	201	-	-	893.4	-	-	-	69.9	55.2
One (1) wine room, (EU-41)	-	-	-	-	-	19.5	-	-	-	-	-
One (1) tank farm, (EU-42)	-	-	-	-	-	19.0	-	-	-	-	-
EU-43, which consists of Building 88	-	-	-	-	-	4.69	-	-	-	-	-
One (1) mini-tank farm, (EU-45)	-	-	-	-	-	3.59	-	-	-	-	-
One (1) barrel and emptying operation, (EU-61)	-	-	-	-	-	5.8	-	-	-	-	-
Six (6) warehouses, (EU-71 through EU-76)	-	-	-	-	-	1867	-	-	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of this Pemitting Action (tons/year)										
	PM	PM10*	PM2.5**	SO2	NOx	VOC	CO	**GHGs 10/30/09**	GHGs **11/29/13**	Total HAPs	Acetaldehyde
One (1) steam boiler (EU-96)	1.99	7.96	7.96	0.63	293.4	5.76	88	126,497	126,479	1.98	-
One (1) steam boiler, (EU-97)worst case fuel)	191	2.47	2.24	39.4	22.0	0.50	7.58	30,791	30,794	1.98	-
One (1) loading rack, identified EU-46	-	-	-	-	-	6.69	-	-	-	0.05	6.69E-03
Fugitive Emissions	-	-	-	-	-	128	-	-	-	1.28	1.28E-01
Insignificant Activities											
Emergency Generator-diesel	0.28	0.16	0.16	1.62	9.6	0.28	2.20	466	466	4.41E-03	7.06E-05
Emergency generator-ng	0.001	0.001	0.001	0.00	0.096	0.004	0.012	4.14	4.29	2.38E-03	2.35E-04
FW Pump-Diesel	0.04	0.02	0.02	0.24	1.41	0.04	0.32	68.4	68.4	6.47E-04	1.04E05
Total	**499**	**505**	**250**	**41.8**	**325**	**3,566**	**98**	**157,826**	**157,811**	**79.3**	**60.2**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	**100,000 CO2e**	100,000 CO2e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	**100,000 CO2e**	100,000 CO2e	NA	NA

negl. = negligible
* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
**PM2.5 listed is direct PM2.5.
1) Since the source is no longer 1 of the 28 listed source categories fugitive PM/PM10/PM2.5 and VOC emissions no longer count toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. However, fugitive HAP emissions still count toward the determination of Part 70 Permit applicability.

(a) This existing stationary source is major for PSD because the emissions of at least one attainment pollutant are greater than two hundred fifty (>250) tons per year, emissions of GHGs are equal to or greater than one hundred thousand (>100,000) tons of CO_2 equivalent emissions (CO_2e) per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
One (1) corn receiving and storage system, identified as EU-12 PM	filter	Y	>100	<100	100	Y	N
One (1) corn receiving and storage system, identified as EU-12 PM10	filter	Y	>100	<100	100	Y	N
One (1) corn receiving and storage system, identified as EU-12 PM2.5	filter	Y	<100	<100	100	N	N
Six (6) hammermills, collectively identified as EU-14 PM	BH	Y	<100	<100	100	N	N
Six (6) hammermills, collectively identified as EU-14 PM10	BH	Y	<100	<100	100	N	N
Six (6) hammermills, collectively identified as EU-14 PM2.5	BH	Y	<100	<100	100	N	N
Silos, surge hopper, and transport system: EU-34 through EU-36 PM	BH	Y	<100	<100	100	N	N
Silos, surge hopper, and transport system: EU-34 through EU-36 PM10	BH	Y	<100	<100	100	N	N
Silos, surge hopper, and transport system: EU-34 through EU-36 PM2.5	BH	Y	<100	<100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the corn receiving and storage system (EU-12) for PM and PM10. The Compliance Determination and Monitoring Requirements section includes CAM requirements as follows:

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with EU-12, at least once per day when this process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 3.0 and 9.0 inches of water unless a different upper-bound or lower bound value for this range is determined during the latest stack test Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) Visible emission notations of EU-12 and EU-34 through EU-36 stack exhausts (S-111, S-112, S-341 through S-344, S-350, and S-360) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the

appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

NSPS

(a) The requirements of the New Source Performance Standard, 40 CFR, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 are not included in the permit for the two (2) steam boilers, identified as EU-96 and EU-97 because both have heat input capacities of less than two hundred and fifty (250) mmBtu/hr, each.

(b) The requirements of the New Source Performance Standard for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 40 CFR 60, Subpart Da, because for the two (2) steam boilers, identified as EU-96 and EU-97 because both have heat input capacities of less than two hundred and fifty (250) mmBtu/hr, each and the units do not generate power for sale.

(c) The requirements of the New Source Performance Standard, 40 CFR, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 are not included in the permit for because the two (2) steam boilers, identified as EU-96 and EU-97, they are not electric utility steam generating units.

(d) The requirements of the New Source Performance Standard, 40 CFR, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units are not included in the permit for because the steam boiler, identified as EU-96, was constructed before June 19, 1984.

(e) The requirements of the New Source Performance Standard, 40 CFR, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units are not included in the permit for because steam boiler, identified as EU-97, has a heat input capacity of less than one hundred (100) mmBtu/hr.

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(f) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, and 326 IAC 12-1 are not included in the permit for because the steam boiler, identified as EU-96, was constructed before before June 9, 1989.

(g) The steam boiler, identified as EU-97, was constructed after June 9, 1989 and has a heat input capacity of 45.6 mmBtu/hr when burning natural gas and 47.6 mmBtu/hr when burning No. 2 fuel oil, which are each between ten (10) mmBtu/hr and one hundred (100) mmBtu/hr. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, and 326 IAC 12-1, New Source Performance Standards, are included in the permit for the boiler.

The natural gas-fired steam boiler, using No.2 fuel oil as backup, identified as EU-97, is subject to the following portions of Subpart Dc. Non applicable portions of the NSPS will not be included in the permit.

(1) 40 CFR 60.40c(a) through (d)
(2) 40 CFR 60.41c

(3) 40 CFR 60.42c(d) through (j)
(4) 40 CFR 60.43c(c), (d), and (e)(1)
(5) 40 CFR 60.44c(a) through (c), (e), (g) through (j)
(6) 40 CFR 60.45c(a), (c), and (d)
(7) 40 CFR 60.46c(d) through (f)
(8) 40 CFR 60.47c(a), (b), and (d)
(9) 40 CFR 60.48c(a) through (d), (e)(1) through (7), and (11), (f)(1), and (g) through (j)

(h) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 are not included in the permit for the wine room, identified as EU-41, the tank farm, identified as EU-42, EU-43, consisting of building 88, , the mini tank farm, identified as EU-45, and the six (6) warehouses, identified as EU-71 through EU-76, because pursuant to 40 CFR 60.110b (d)(7) all store beverage alcohol and are exempt.

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(i) The requirements of New Source Performance Standard, 40 CFR 60, Subpart DD, Standards of Performance for Grain Elevators, are not included in the permit because the source is not classified as a grain elevator or a grain storage elevator because it has a source-wide maximum capacity of grain of less than 2.5 million and 1.0 million bushels of grain, respectively.

(j) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes, 40 CFR 60, Subpart III (326 IAC 12), are not included in the permit since the source does not produce any of the chemicals listed in 40 CFR 60.617 as a product, co-product, by-product, or intermediate.

(k) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations, 40 CFR 60, Subpart NNN (326 IAC 12), are not included in the permit since the source does not produce any of the chemicals listed in 40 CFR 60.667 as a product, co-product, by-product, or intermediate.

(l) The requirements of the New Source Performance Standard for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes, 40 CFR 60, Subpart RRR (326 IAC 12), are not included in the permit since the source does not produce any of the chemicals listed in 40 CFR 60.707 as a product, co-product, byproduct, or intermediate.

(m) Ethanol is one of the chemicals listed in 40 CFR 60.489. Therefore, The is subject to the requirements of Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, 40 CFR 60,Subpart VV (326 IAC 12).

This source was constructed prior to 1950 and therefore a majority of the equipment was built prior to January 5, 1981. The requirements of 40 CFR 60,Subpart VV (326 IAC 12) apply to the following at this source:

(1) Five (5) open fermenters, approved in 2004 for construction, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(2) Three (3) open fermenters, approved in 2005 for construction, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(3) Three (3) open fermenters, approved in 2006, for construction, exhausting to Stack S-201, capacity: 27,854 gallons, each.

Nonapplicable portions of the NSPS will not be included in the permit. The ethanol production plant is subject to the following portions of 40 CFR 60, Subpart VV.

(1) 40 CFR 60.480
(2) 40 CFR 60.481
(3) 40 CFR 60.483-1
(4) 40 CFR 60.483-2
(5) 40 CFR 60.484
(6) 40 CFR 60.485
(7) 40 CFR 60.486
(8) 40 CFR 60.487
(9) 40 CFR 60.488
(10) 40 CFR 60.489

(n) The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII, are not included in the permit for the since the 1600 hp diesel-fired emergency generator, and the 0.121 MMBtu/hr natural gas-fired emergency generator, were manufactured and installed before April 1, 2006 and the 235 hp diesel-fired emergency fire water pump was manufactured and installed before July 1, 2006.

(o) The requirements of the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60, Subpart JJJJ, are not included in the permit for the since the 1600 hp diesel-fired emergency generator, the 0.121 MMBtu/hr natural gas-fired emergency generator and the 235 hp diesel-fired emergency fire water pump are compression ignition internal combustion engines and not spark ignition internal combustion engines.

Comment [MW1]: The natural gas-fired engine is a spark ignition unit, not a compression ignition unit as listed.

NESHAP

(p) The requirements of 40 CFR 63, Subpart F, G, and H – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry are not included. To be subject to the requirements of these NESHAP, this source must consist of chemical manufacturing process units that meet all of the criteria in 40 CFR 63.100(b)(1), (b)(2) and (b)(3). Since this source only produces ethanol, which is not one of the chemicals listed in Table 1 of 40 CFR 63, Subpart F or in 40 CFR 63.100(b)(1)(i) and (b)(1)(ii), this source is not subject to the requirements of these NESHAP.

(q) The requirements of 40 CFR 63, Subpart I – National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks are not included because this source does not manufacture any of the materials listed in 40 CFR 63.190(b)(1) through (b)(6).

(r) The requirements of the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing, 40 CFR 63, Subpart FFFF, are not included in this permit because this source is not subject in accordance with 40 CFR 63.2435 (b) (1) through (3). The SIC for this facility is 2085.

(s) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ), because the source operates a stationary reciprocating internal combustion engine (RICE) at a major or area source of HAP emissions. The units subject to this rule include the following:

(1) One (1) Diesel-fired emergency generator, with a maximum capacity of 1600 hp and installed in 1999.

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(2) One (1) Diesel-fired emergency fire water pump with a maximum capacity of 235 horsepower and installed in 1996.

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(3) One (1) Natural gas-fired emergency generator, with a maximum capacity of 0.121 MMBtu/hr and installed in 2005.

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart ZZZZ.

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(a),(b)
(3) 40 CFR 63.6590(a)(1)(i),(ii),(b)(3)
(4) 40 CFR 63.6595
(5) 40 CFR 63.6600
(6) 40 CFR 63.6602
(7) 40 CFR 63.6604
(8) 40 CFR 63.6605
(9) 40 CFR 63.6610
(10) 40 CFR 63.6625(e)(1),(f),(h),(i)
(11) 40 CFR 63.6640 (f)(2)
(12) 40 CFR 63.6645(a)
(13) 40 CFR 63.6655 except (c)
(14) 40 CFR 63.6670
(15) 40 CFR 63.6675
(16) Table 1b
(17) Table 2b
(18) Table 6
(19) Table 8

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, applies to the two emergency generators and the emergency fire water pump, except as otherwise specified in 40 CFR 63, Subpart ZZZZ.

(t) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD for the steam boiler, identified as EU-96 utilizing natural gas and for steam boiler, identified as EU-97 and utilizing natural gas and No. 2 fuel oil for back-up. ~~The units subject to this rule include the following:~~

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart DDDDD.

(1) 63.7480
(2) 63.7485
(3) 63.7490 (a)(1), (d)
(4) 63.7495 (b). (d)
(5) 63.7499 (l). (m)
(6) 63.7500 (a)(1)
(7) 63.7505 (a), (h)
(8) 63.7540 (a)(10), (c)(13)
(9) 63.7545
(10) 63.7550
(11) 63.7555
(12) 63.7560
(13) 63.7565
(14) 63.7570
(15) 63.7575
(16) Table 2
(17) Table 3
(18) Table 9
(19) Table 10

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart DDDDD.

(u) The requirements of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (40 CFR 63, Subpart CCCCCC), are not included in this permit because this source is not subject in accordance with 40 CFR 63.63.11111, the monthly throughput is less 10,000 gallons of gasoline and is not located at an area source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (PSD Minor Limit)
(a) Pursuant to CP 029-6331-00005 issued March 14, 1997:

(1) The PM and PM_{10} emissions from the corn truck unloading hopper, grain receiving elevator and conveyor, corn storage silo, and grain cleaner, which are part of EU-12, shall be limited to 1.20 pounds per hour.

(2) The PM and PM_{10} emissions from the grain air transport system, which is part of EU-12, shall be limited to 0.219 pounds per hour.

(3) The PM and PM_{10} emissions from the two (2) storage silos and the two (2) surge hoppers, collectively identified as EU-34, shall be limited to 0.136 pounds per hour.

(4) The PM and PM_{10} emissions from one (1) air transport system and scale to the

rail car loading area, identified as EU-35, and the one (1) air transport system and scale to the truck loading area, identified as EU-36, shall be limited to 0.289 pounds per hour.

(5) The PM and PM_{10} emissions from one (1) rail car loader, identified as EU-37 the truck loader, identified as EU-38, shall be limited to 1.25 pounds per hour.

Compliance with these limitations shall render the requirements of 326 IAC 2-2, PSD, not applicable.

(b) Pursuant to CP 029-2159-00005, issued on February 10, 1992, the steam boiler, identified as EU-97, shall be limited to 1,848,000 gallons of No. 2 fuel oil per twelve (12) consecutive month period, with compliance determined at the end of each month, and no fuel shall be combusted than contains greater than 0.3% sulfur.

(c) The SO_2 emissions from the steam boiler, identified as EU-97, when combusting No. 2 fuel oil, shall not exceed 0.043 pounds of SO_2 per gallon of No. 2 fuel oil.

Compliance with these limitations shall limit the SO_2 emissions from the steam boiler, identified as EU-97, to 39.4 tons per year, and render the requirements of 326 IAC 2-2, PSD, not applicable. This will also satisfy the requirements of 326 IAC 7-1.1-2, Sulfur Dioxide Emissions Limitations.

326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC is greater than 250 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2014, and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6.5-1-2 (Particulate Matter Emissions Except Lake County)
According to a decision by the Office of Environmental Adjudication (OEA), issued on May 14, 2004, it is unlawful for IDEM, OAQ to apply the requirements of 326 IAC 6.5-1-2 (Particulate Matter Emissions Except Lake County) to the steam boiler, identified as EU-97, all grain processing facilities, and all insignificant activities. Therefore, the requirements of 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating) will be applied to the steam boiler, identified as EU-97, and the requirements of 326 IAC 6-3-2 (Particulate Matter Emissions Limitations for Manufacturing Processes) will be applied to all grain processing facilities and all insigificant activities.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source was permitted prior to 1985. Therefore, pursuant to 326 IAC 6-5-1(b), the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)
The steam boiler, identified as EU-96, and constructed before 1950, and the steam boiler, identified as EU-97 and constructed in 1992, were constructed before the July 27, 1997 applicability date of 326 IAC 2-4.1. Therefore, the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) are not applicable.

326 IAC 6.5-3-8 (Particulate Matter Emissions for Dearborn County)
The steam boiler, identified as EU-96 (identified as Boiler 6), shall burn natural gas only.

Pursuant to 326 IAC 6.5-1-1(b), particulate limitations shall not be established for combustion units that burn only natural gas. Therefore, the limitations established in 326 IAC 6.5-3-8 for Boiler 6 shall not apply.

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)
(a) Since the OEA declared that IDEM, OAQ, was not permitted to apply the requirements of 326 IAC 6.5-1-2 to the steam boiler, identified as EU-97, the requirements will default back to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating).

(b) Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation .

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	**Construction Date *(Modification Date)***	**Operating Capacity (MMBtu/hr)**	**Q (MMBt/hr)**	**Calculated Pt (lb/MMBtu)**	**Particulate Limitation, (Pt) (lb/MMBtu)**	**PM PTE based on AP-42 (lb/MMBtu)**
Boiler EU-97	1992	47.6	47.6	0.40	0.40	0.002
Boiler EU-96	*(2013)*	244	291.6	0.26	0.26	0.002
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.						

* Boiler EU-96 was modified in 2013 to burn natural gas only.

326 IAC 6-3-2 (Particulate Matter Emissions Limitations for Manufacturing Processes)

(a) Since the OEA declared that IDEM, OAQ, was not permitted to apply the requirements of 326 IAC 6.5-1-2 to grain processing facilities, the requirements will default back to 326 IAC 6-3-2 (Particulate Matter Emissions Limitations for Manufacturing Processes).

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from each emission unit shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations and as shown in the table that follows:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit (baghouse)	Unit Description	Process weight rate (tons per hour)	Allowable particulate emission rate (pounds per hour)
EU-11	grain receiving and Pneumatic Conveyor	28.0	38.2
EU-12	Corn receiving and storage system	446	67.6
EU-13	Grain Storage Bins	224	59.7
EU-14	Hammermills and hopper	54.9	45.4
EU-32	Rotary dryers, cooler and transport system	53.8	45.3
EU-34	Storage silos and surge hoppers	21.0	31.5
EU-35	Air transport system and scale to rail car loading area	7.00	15.1
EU-36	Air transport system and scale to the	7.00	15.1

Emission Unit (baghouse)	Unit Description	Process weight rate (tons per hour)	Allowable particulate emission rate (pounds per hour)
	truck loading area		
EU-37	Rail Loading	7.00	15.1
EU-38	Truck Loading	7.00	15.1

Therefore, the particulate rate calculated for each emission unit shows that each emission unit can comply with the calculated allowable particulate emission rate pursuant to 326 IAC 6-3-2 as shown in the above table.

326 IAC 7-1.1-2 (Sulfur Dioxide Emissions Limitations)
Pursuant to 326 IAC 7-1.1-2(a)(3), the sulfur dioxide emissions from the steam boiler, identified as EU-97, shall not exceed five-tenths (0.5) pounds per MMBtu.

326 IAC 7-4-13 (Dearborn County sulfur dioxide emission limitations)
On March 11, 2013, the source notified IDEM OAQ that the steam boiler, identified as EU-96 is only capable of burning natural gas and all other alterative fuel equipment and capabilites have been removed. Therefore 326 IAC 7-4-13 is not applicable.

326 IAC 8-1-6 (New facilities; general reduction requirements)
(a) The fourteen (14) open fermenters, collectively identified as EU-21, the twenty-four (24) closed fermenters, collectively identified as EU-22, the two (2) beer wells, identified as EU-23 and EU-24, the three (3) beer stills, collectively identified as EU-25, the two (2) column and kettles, collectively identified as EU-26, the three (3) gin stills, collectively identified as EU-27, the doubler still, identified as EU-29, the three (3) multi-column stills and five (5) distillation columns, collectively identified as EU-20, the four (4) paddle screens, collectively identified as EU-31, the wine room, identified as EU-41, the tank farm, identified as EU-42 and the six (6) warehouses, identified as EU-71 through EU-76, were all constructed before January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

(b) EU-43, consisting of Building 88, constructed in 1989 and the rum handling area, constructed in 1997, the mini-tank farm, identified as EU-45, installed in 1989 and 1997, have unrestricted VOC emissions of less than twenty-five (25.0) tons per year, total, and thus less than twenty-five (25.0) tons per year, each. Therefore, pursuant to 326 IAC 8-1-6(1), the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) are not applicable.

326 IAC 8-6 (Organic Solvent Emissions Limitations)
Pursuant to 326 IAC 8-6-1, this rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. Pursuant to 326 IAC 8-6-1, this source is not subject to the requirements 326 IAC 8-6, because this source, which is located in Dearborn County, did not commence operation after October 7, 1974 and prior to January 1, 1980.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
This rule applies to stationary vessels used to store volatile organic liquid (VOL) that are located in Clark, Floyd, Lake, or Porter County. This source is located in Dearborn County. Therefore, the requirements of 326 IAC 8-9 are not applicable to the storage tanks or blending tanks located at the source.

State Rule Applicability – Insignificant Activities

326 IAC 6-3-2 (Particulate Matter Emissions Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations shall be limited by the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-3 (Organic Solvent Degreasing Opertions)
The cold cleaning operations are not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations). This rule applies to organic solvent degreasing facilities constructed after January 1, 1980, is not .located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties and before July 1, 1990. The cold cleaning operations at this source were constructed prior to 1980, therefore, 326 IAC 8-3 does not apply.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

(a) In order to ensure compliance with 326 IAC 6-3-2, the baghouses for particulate control shall be in operation and control emissions from EU-12 and EU-34 through EU-36, at all times that the facilities are in operation.

(b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
EU-12 and EU-34 through EU-36	Visible Emissions	Daily	Normal-Abnormal	Response Steps
EU-12 and EU-34 through EU-36 Baghouses	Parametric Monitoring	Daily	3.0-9.0 in of water	Response Steps
EU-97	Visible Emissions	Daily	Normal-Abnormal	Response Steps

(a) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

These monitoring conditions are necessary because the control devices for the facilities must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit Renewal No. 029-32386-00005. These corrections, changes, and removals may include Title I changes (ex changes that add or modify synthetic minor emission limits). Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

IDEM OAQ Changes

The following is a summary of changes that have been made throughout the permit:

(a) **Multiple Conditions - Rule References**

On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions. The change is only to citation of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Insignificant Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, Section C - Risk Management Plan, the Facility Descriptions, and Section D - Preventative Maintenance Plan.

(b) On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule cite of the "responsible official" definition. The rule citation has been changed throughout the permit as follows:

326 IAC 2-7-1~~(34)~~**(35)**

(c) **Multiple Conditions - Typographical Errors, Language Clarification**
Throughout the permit, typographical and grammatical errors have been corrected. Additionally, changes to language for clarification or to align with the current preferred permit language conventions have been made.

(d) **Multiple Conditions-Timeframe References**
IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than" except for the timelines in subparagraphs (b)(4) and (b)(5) of Section B - Emergency Provisions and Section B - Annual Fee Payment, in which the underlying rules state "within".

(e) **Multiple Conditions-Responsible Official References**
326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(35) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official".

(f) **Multiple Conditions-Certification Requirement References**
IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet.

(g) **Multiple Conditions - Branch Name Updates**
Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.

Modifications to Section A of the Permit

(a) The source requested removal of equipment and a change of descriptions of some of the equipment.

(b) The facility descriptions have been updated to reflect the construction approval dates, and to clarify the applicability of all federal and state rules.

(c) IDEM, OAQ changes have been made where applicable.

Section A of the permit has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

(a) One (1) **grain receiving and** pneumatic conveyor, identified as EU-11, installed prior to 1950, equipped with a dust collector, exhausting to Stack S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.

(b) One (1) corn receiving and storage system, identified as EU-12, installed in 1997, consisting of the following equipment:

(1) One (1) unloading hopper, equipped with **baghouse using** fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.

(2) One (1) conveyor and bucket elevator, equipped with **baghouse using** baghouse using fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.

(3) One (1) storage silo, equipped with **baghouse using** fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 75,000 bushels of corn.

(4) One (1) grain cleaner, equipped with **baghouse using** fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 26.6 tons of corn per hour.

(5) One (1) grain transport system, equipped with **baghouse using** fabric filters for particulate matter control, exhausting to Stack S-112, capacity: 26.6 tons of corn per hour.

(c) Seven (7) storage bins, collectively identified as EU-13, installed prior to 1950, equipped with **baghouse using** fabric filters for particulate matter control, exhausting inside, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.

(d) Six (6) hammermills **and hopper**, collectively identified as EU-14, installed prior to 1950, equipped with a baghouse for particulate matter control, exhausting inside through Stack S-104, capacity: 109,760 pounds of grain per hour, total.

(e) Three (3) multi-column stills and five (5) distillation columns, collectively identified as EU-20, installed prior to 1950, consisting of the following:

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(f) EU-21, consisting of the following units:

(1) Three (3) open fermenters, installed prior to 1950, exhausting to Stack S-201, capacity: 25,300 gallons, each.

(2) Five (5) open fermenters, installed in 2004, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(3) Three (3) open fermenters, installed in 2005, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(4) Three (3) open fermenters, installed in 2006, exhausting to Stack S-201, capacity: 27,854 gallons, each.

Under NSPS, Subpart VV, the pumps, compressors, pressure relief devices in gas/vapor service, sampling connection systems, open-ended valves or lines, and valves of five (5) open fermenters, six (6) open fermenters and are considered to be affected facilities.

(g) Twenty-four (24) closed fermenters, collectively identified as EU-22, installed prior to 1950, equipped with one (1) ethanol scrubber, exhausting to Stack S-202, capacity: 55,000 gallons, each.

(h) Two (2) beer wells, identified as EU-23 and EU-24, installed prior to 1950, exhausting to Stacks S-203 and S-204 respectively, capacity: 38,886 and 102,098 gallons, respectively.

(i) Three (3) beer stills, collectively identified as EU-25, installed prior to 1950, exhausting to Stack S-205, consisting of the following:

(1) Still #25, capacity: 4,600 gallons per hour,

(2) Still #26, capacity: 14,600 gallons per hour; and

(3) Still #31, capacity: 12,000 gallons per hour.

(j) Two (2) column & kettles, collectively identified as EU-26, installed prior to 1950, exhausting to Stack S-206, capacity: 727 proof gallons per hour, each.

(k) Three (3) gin stills (#10, #22, and #23), collectively identified as EU-27, installed prior to 1950, exhausting to Stack S-207, capacity: 600 proof gallons per hour, each.

(l) One (1) doubler still, identified as EU-29, installed prior to 1950, exhausting to Stack S-209, capacity: 672 proof gallons per hour.

(m) Four (4) paddle screens, collectively identified as EU-31, installed prior to 1950, exhausting to Stack S-301, capacity: 56,000 pounds per hour, each.

(n) Five (5) rotary dryers, one (1) cooler and one (1) transport system, collectively identified as EU-32, installed prior to 1950, consisting of the following:

(1) Two (2) rotary dryers, exhausting to Stacks S-305 and S-306, each equipped with a wet scrubber, capacity: 25,500 pounds of grain per hour, each,

(2) Three (3) rotary dryers, exhausting to Stacks S-307 through S-309, each controlled by a wet scrubber, capacity: 14,500 pounds of grain per hour, each; and

(3) One (1) cooler and one (1) transport system, controlled by a cyclone, exhausting to Stack S- 310, capacity: 13,000 pounds of grain per hour.

(o) Three (3) conveyors, collectively identified as EU-33, installed prior to 1950, exhausting to Stacks S-302 through S-304, capacity: 38,000 pounds of grain per hour, each.

(p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997, consisting of the following:

(1) Two (2) storage silos, and two (2) surge hoppers, collectively identified as EU-34, equipped with two (2) dust collectors, exhausting to Stacks S-341 through S-344,

capacity: 13,100 cubic feet, total for the two (2) storage silos, each and 14,000 pounds of grain per hour, each, for the two (2) surge hoppers.

(2) One (1) air transport system and scale to the rail car loading area, identified as EU-35, controlled by a dust collector, exhausting to Stack S-350, capacity: 14,000 pounds of grain per hour.

(3) One (1) air transport system and scale to the truck loading area, identified as EU-36, controlled by a dust collector, exhausting to Stack S-360, capacity: 14,000 pounds of grain per hour.

(4) One (1) rail car loader, identified as EU-37, exhausting to Stack S-370, capacity: 14,000 pounds of grain per hour.

(5) One (1) truck loader, identified as EU-38, exhausting to Stack S-380, capacity: 14,000 pounds of grain per hour.

(q) One (1) wine room, identified as EU-41, consisting of forty-three (43) organic liquid storage tanks, installed prior to 1950, exhausting to Stack S-410, capacity: 524,504 gallons of ethanol, total and a throughput of 32,000,000 proof gallons per year, total, consisting of the following:

(1) Thirty-five (35) organic liquid storage tanks, installed prior to 1950, capacity: 467,518 gallons of ethanol, total.

(2) Eight (8) organic liquid storage tanks, installed in 1988, capacity: 56,986 gallons of ethanol, total.

(r) One (1) tank farm, identified as EU-42, consisting of nine (9) organic liquid storage tanks, installed prior to 1950, exhausting to Stack S-420, capacity: 750,000 gallons of ethanol, each.

(s) EU-43, consisting of the following units:

(1) One (1) Bldg 88, consisting of twenty-seven (27) organic liquid storage tanks, installed in 1989, exhausting to Stack S-430, capacity: 489,250 gallons of ethanol, total.

(2) One (1) rum handling area, installed in 1997, exhausting to the atmosphere, capacity: 3,501,429 gallons of rum.

~~(t) One (1) regauge tank area, identified as EU-44, consisting of fifty-six (56) tanks, installed in 1960, exhausting to Stack S-440, capacity: 592,362 gallons of ethanol, total.~~

(~~u~~t) One (1) mini tank farm, identified as EU-45, consisting of eight (8) tanks:

(1) Seven organic liquid storage (7) tanks, installed in 1989, exhausting to Stack S-435, capacity: 779,800 gallons of ethanol, total.

(2) One (1) organic liquid storage tank, installed in 1994, capacity: 3,500 gallons of ethanol.

~~(v) One (1) bottling tank room, identified as EU-51, consisting of forty-five (45) organic liquid storage tanks, with a total capacity of 452,000 gallons of ethanol, consisting of the following:~~

~~(1) Forty-one (41) organic liquid storage tanks, installed in 1969, exhausting to Stack S-510 and~~

~~(2) Four (4) organic liquid storage tanks, installed in 2003, exhausting to Stack S-510.~~

~~(w) Seven (7) bottling lines, and one (1) 50-ml bottling line, collectively identified as EU-52, installed prior to 1950 and modified in 2003, exhausting to Stack S-520, capacity: 452,000 gallons of ethanol.~~

~~(x) One (1) cooler operation, identified as EU-53, installed prior to 1988, exhausting to Stack S-530, capacity: 2,187 cases per hour.~~

(~~y~~**u**) One (1) barrel filling and emptying operation, identified as EU-61, installed prior to 1950, exhausting to Stack S-610, with a throughput capacity of 13,000,000 proof gallons and 12,775,000 proof gallons of whiskey and gin per year, respectively, and a maximum capacity of 29,700 gallons of whiskey and gin per hour .

(~~z~~**v**) One (1) Warehouse C, identified as EU-71, installed prior to 1950, exhausting to Vent 701, capacity: 69,306 barrels.

(w) One (1) Warehouse E, identified as EU-72, installed prior to 1950, exhausting to Vent 702, capacity: 101,032 barrels.

(x) One (1) Warehouse G, identified as EU-73, installed prior to 1950, exhausting to Vent 703, capacity: 84,097 barrels.

(y) One (1) Warehouse J & M, identified as EU-74, installed prior to 1950, exhausting to Vent 704, capacity: 100,000 barrels.

(z) One (1) Warehouse L, identified as EU-75, installed prior to 1950, exhausting to Vent 705, capacity: 93,438 barrels.

(aa) One (1) Warehouse N, identified as EU-76, installed prior to 1950, exhausting to Vent 706, capacity: 93,405 barrels.

(bb) One (1) steam boiler, identified as EU-96, installed in 1977, using ~~coal-based alternative fuels (CBAF), coal~~, natural gas~~, #6 fuel oil, and/or wood, equipped with an electrostatic precipitator for particulate matter control~~, **and** exhausting to Stack S-906, heat input capacity: 244 million British thermal units per hour.

(cc) One (1) natural gas fired steam boiler, identified as EU-97, using #2 fuel oil as back-up, installed in 1992, exhausting to Stack S-907, heat input capacity: 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using #2 fuel oil. Under 40 CFR 60, Subpart Dc, this facility is considered an industrial, institutional, or commercial boiler.

(dd) One (1) loading rack system, consisting of four (4) rail car and four (4) truck loading racks, identified as EU-46, installed in 1989, exhausting to the atmosphere, capacity: 31,000,000 gallons of ethanol per year.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are specifically

regulated, as defined in 326 IAC 2-7-1(21):

~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour [326 IAC 6-3-2].~~

~~(b) Three (3) natural gas fired boilers with a heat input of capacity of 4.2 MMBtu/hr each.~~

(~~c~~**a**) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(b) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower.

(1) One (1) Diesel-fired emergency generator, with a maximum capacity of 1600 hp and installed in 1999. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(c) Other emergency equipment as follows: stationary fire pumps.

(1) One (1) Diesel-fired emergency fire water pump with a maximum capacity of 235 horsepower and installed in 1996. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

(e) A gasoline and fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(1) One (1) gasoline tank, with a maximum capacity of 200 gallons.

(f) Activities associated with emergencies, including natural gas reciprocating engines not exceeding 16,000 horsepower.

(1) One (1) Natural gas-fired emergency generator, with a maximum capacity of 0.121 MMBtu/hr and installed in 2005.

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(1) One (1) diesel fuel tank with storage capacity of 200 gallons.

(b) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, constructed before 1970.

(d) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(e) Closed loop heating and cooling systems.

(f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(g) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

(h) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

~~(j) Conveyors as follows: covered conveyors for coal or coke conveying of less than or equal to 360 tons per day.~~

~~(k) Coal bunker and coal scale exhausts and associated dust collector vents.~~

(lj) Asbestos abatement projects regulated by 326 IAC 14-10.

(~~mk~~) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(~~nl~~) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

A.~~45~~ Part 70 Permit Applicability [326 IAC 2-7-2]

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Modifications to Sections B and C of the Permit

IDEM, OAQ has made changes to some of the standard language in the B and C conditions of the permit to help clarify the intent of these conditions. The following is a summary of the revisions that have been made to the B and C Sections of the permit:

(a) **Section B - Duty to Provide Information**
IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "responsible official".

(b) **Section B - Certification**
IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule and to clarify that Section B - Certification only states what a certification must be.

(c) **Section B - Preventive Maintenance Plan**
IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has also decided to clarify other aspects of Section B - Preventive Maintenance Plan.

(d) **Section B - Emergency Provisions**
IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report. IDEM, OAQ has changed references of Compliance Section to Compliance and Enforcement Branch.

(e) **Section B - Deviation from Permit Requirements and Section C - General Reporting Requirements**
IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed and the requirements of that condition have been added to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report.

Subparagraph (g)(4), which is now (f)(4), has been revised to match the underlying rule language.

(f) **Section B - Permit Renewal**
IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.

(g) **Section B - Permit Revision Under Economic Incentives and Other Programs**
IDEM, OAQ has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.

(h) **Section B - Source Modification Requirement**
IDEM, OAQ has decided to reference 326 IAC 2 in Section B - Source Modification Requirement rather than the specific construction rule.

(i) **Section C - Opacity**
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

(j) **Section C - Incineration**
IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules. The revisions to 326 IAC 9-1-2 were SIP approved by EPA in a November 30, 2004 rulemaking. Therefore, 326 IAC 9-1-2 is federally enforceable. The statement at the end of Section C - Incineration has been removed.

(k) **Section C - Performance Testing**
IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

(o) **Section C - Compliance Monitoring**
IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

(p) **Section C - Instrument Specifications**
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range

(q) **Section C - Monitoring Methods**
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

(q) **Section C - Emergency Reduction Plans**
IDEM, OAQ has decided not to list the submission date of the ERP because the ERP can be updated without a permit change.

(r) **Section C - Response to Excursions or Exceedances**
IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM.

(s) **Section C - Actions Related to Noncompliance Demonstrated by a Stack Test**
IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

(t) **Section C - Emission Statement**
IDEM, OAQ decided to remove paragraph (c) of Section C - Emission Statement since it was duplicative of the requirement in Section C - General Reporting Requirements.

(u) **Section C- General Reporting Requirements**
IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

(v) **Section C - General Record Keeping Requirements**
The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.
IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM.

IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

(w) **Section C - Compliance with 40 CFR 82 and 326 IAC 22-1**

IDEM, OAQ has decided to simplify the referencing

The permit has been revised as follows:

SECTION B GENERAL CONDITIONS

* * *

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) * * *

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that,~~**A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**

(i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(ii) **the certification states that,** based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) ~~One (1) certification shall be included, using~~**The Permittee may use** the attached Certification Form, **or its equivalent** with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) ~~The~~ **A** "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. ~~The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent~~**All** certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

(b) * * *

(c) The annual compliance certification report shall include the following:

(1) * * *

(2) * * *

(3) * * *

(4) * * *

(5) * * *

The submittal by the Permittee does require ~~the~~ **a** certification ~~by~~ **that meets** the **requirements of 326 IAC 2-7-6(1) by a** "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5~~(1),(3) and (13)~~ **(12)**] [~~326 IAC 2-7-6(1) and (6)~~][326 IAC 1-6-3]

~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) **If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:**

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions ~~or potential to emit.~~. The PMPs **and their submittal** do not require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

(~~c~~**d**) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) * * *

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) * * *

(2) * * *

(3) * * *

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance ~~Section~~ **and Enforcement Branch**), or
Telephone Number: 317-233-0178 (ask for Compliance ~~Section~~ **and Enforcement Branch)**
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

* * *

The notification which shall be submitted by the Permittee does not require t~~he a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by th~~e~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

(6) * * *

* * *

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)~~(9)~~ **(8)** be revised in response to an emergency.

***

~~B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]~~

~~(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:~~

~~Indiana Department of Environmental Management~~
~~Compliance and Enforcement Branch, Office of Air Quality~~
~~100 North Senate Avenue~~
~~MC 61-53 IGCN 1003~~
~~Indianapolis, Indiana 46204-2251~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

B.~~16~~**15** Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(35).

* * *

B.~~17~~**16** Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) * * *

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified**, pursuant to 326 IAC 2-7-4(a)(2)(D),** in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.~~18~~**17** Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) * * *

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application ~~shall be certified~~**does require a certification that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1(35).

(c) * * *

B.~~19~~**18** Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.~~20~~**19** Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b)~~,~~ **or** (c)~~, or (e)~~ without a prior permit revision, if each of the following conditions is met:

***

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)~~,~~ **or** (c)~~, or (e)~~. The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1)~~,~~ **and** (c)(1)~~, and (e)(2)~~.

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require ~~the~~**a** certification **that meets the requirements of 326 IAC 2-7-6(1)**by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

* * *

B.2120 Source Modification Requirement [326 IAC 2-7-10.5]

* * *

B.2221 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

* * *

B.2322 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) * * *

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

~~The~~**Any such** application ~~which shall be submitted by the Permittee~~ does require th~~e~~**a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by th~~e~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

(c) * * *

B.2423 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

* * *

B.2524 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

* * *

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in **326 IAC 5-1-1 (Applicability) and** 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

* * *

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 IAC 4-2 ~~and 326 IAC 9-1-2~~ **or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit**.

* * *

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) * * *

(b) * * *

(c) * * *

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require ~~the~~**a** certification **that meets the requirements of 326 IAC 2-7-6(1)**by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

(e) * * *

(f) * * *

(g) * * *

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) ~~All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

~~A~~**For performance testing required by this permit, a** test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

(c) * * *

* * *

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

* * *

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) **For new units:**
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) **For existing units:**

Unless otherwise specified in this permit, **for** all monitoring ~~and record keeping~~ requirements not already legally required**, the Permittee** shall be ~~implemented within~~ **allowed up to** ninety (90) days **from the date** of permit issuance or ~~ninety (90) days~~ of initial start-up, whichever is later~~. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required~~**, to begin such** monitoring ~~related to that equipment~~. If due to circumstances beyond its **the Permittee's** control, ~~that equipment~~ **any monitoring equipment required by this permit** cannot be installed and operated ~~within~~ **no later than** ninety (90) days **after permit issuance or the date of initial startup, whichever is later**, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

~~Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.~~

~~C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

~~Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.~~

C.~~12~~**11** Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**

* * *

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.~~13~~**12** Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

* * *

C.~~14~~**13** Risk Management Plan [326 IAC 2-7-5(**11**~~12~~)] [40 CFR 68]

* * *

C.~~15~~**14** Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) ~~Upon detecting an excursion or exceedance, the~~**The** Permittee shall **take reasonable response steps to** restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing **excess** emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions~~**. The response** may include, but ~~are~~**is** not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned **or are returning** to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to ~~within the indicator range, designated condition, or below the applicable emission limitation~~**normal** or ~~standard, as applicable~~**usual manner of operation**.

(c) * * *

(d) * * *

(e) The Permittee shall ~~maintain~~**record** the ~~following records:~~**reasonable response steps taken.**

~~(1) monitoring data;~~

~~(2) monitor performance data, if applicable; and~~

~~(3) corrective actions taken.~~

C.~~16~~**15** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall~~ submit a description of ~~these~~**its** response actions to IDEM, OAQ, ~~within thirty (30)~~**no later than seventy-five (75)** days ~~of receipt~~**after the date** of the test ~~results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented~~.

(b) A retest to demonstrate compliance shall be performed ~~within~~**no later than** one hundred ~~twenty (120)~~**eighty (180)** days ~~of receipt of~~**after** the ~~original~~**date of the** test ~~results~~. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120)~~**eighty (180)** days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.~~17~~**16** Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251
The emission statement does require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ **a** "responsible official" as defined by 326 IAC 2-7-1-(35).

~~(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

C.~~18~~**17** General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **Support information includes the following, where applicable:**

(AA) All calibration and maintenance records.

(BB) All original strip chart recordings for continuous monitoring instrumentation.

(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required**, the Permittee** shall be ~~implemented within~~**allowed up to** ninety (90) days **from the date** of permit issuance or ~~ninety (90) days~~**the date** of initial start-up, whichever is later**, to begin such record keeping**.

(c) If there is a reasonable possibility (as defined in ~~40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)~~ **326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)**) that a "project" (as defined in 326 IAC 2-2-1(~~qq~~ **oo**) and/or 326 IAC 2-3-1(~~ll~~ **jj**)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(~~ee~~ **dd**) and/or 326 IAC 2-3-1(~~z~~ **y**)) may result in significant emissions

increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(~~rr~~ **pp**) and/or 326 IAC 2-3-1(~~mm~~ **kk**)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(~~qq~~ **oo**) and/or 326 IAC 2-3-1(~~ll~~ **jj**)) at an existing emissions unit, document and maintain the following records:

***

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

***

(iii) Amount of emissions excluded under section 326 IAC 2-2-1(~~rr~~ **pp**)(2)(A)(iii) and/or 326 IAC 2-3-1 (~~mm~~ **kk**)(2)(A)(iii); and

***

(d) If there is a reasonable possibility (as defined in ~~40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)~~ **326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)**) that a "project" (as defined in 326 IAC 2-2-1(~~qq~~ **oo**) and/or 326 IAC 2-3-1(~~ll~~ **jj**)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(~~ee~~ **dd**) and/or 326 IAC 2-3-1(~~z~~ **y**)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(~~rr~~ **pp**) and/or 326 IAC 2-3-1(~~mm~~ **kk**)), the Permittee shall comply with following:

C.~~19~~**18** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph**. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. **except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** This report shall be submitted ~~within~~**not later than** thirty (30) days ~~of~~ **after** the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~**a** certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~**a** "responsible official" as defined by 326 IAC 2-7-1(35). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**

(b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~**The address for report submittal is:**

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) * * *

~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(~~c~~**d**) * * *

(~~d~~**e**) * * *

(~~e~~**f**) The report for project at an existing emissions unit shall be submitted ~~within~~**no later than** sixty (60) days after the end of the year and contain the following:

(1) * * *

(2) * * *

(3) * * *

(4) Any other information that the Permittee ~~deems fit~~**wishes** to include in this report **such as an explanation as to why the emissions differ from the preconstruction projection**.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(~~f~~**g**) * * *

Stratospheric Ozone Protection

C.~~20~~**19** Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with ~~the~~**applicable** standards for recycling and emissions reduction~~:~~

~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~

~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~

~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161~~.

Modifications to the D Sections of the Permit

IDEM, OAQ has made changes to some of the standard language in conditions in the D Sections of the permit to help clarify the intent of these conditions.

(a) The source requested removal of equipment and a change of descriptions of some of the equipment.

(b) The facility descriptions have been updated to reflect the construction approval dates, and to clarify the applicability of all federal and state rules.

(c) IDEM, OAQ has revised the language in the parametric monitoring conditions to clarify when a range should be modified due to test results.

(d) IDEM, OAQ has revised the language in visible emission notations to clarify that a reasonable response may contain one or more steps.

(e) IDEM, OAQ changes have been made where applicable

The D.1 Section of the permit has been revised as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)] Grain Handling, Fermentation, and Distillation

(a) One (1) **grain receiving and** pneumatic conveyor, identified as EU-11, installed prior to 1950, equipped with a dust collector, exhausting to Stack S-103, capacity: 28.0 tons of corn, rye, barley and/or malt per hour.

(b) One (1) corn receiving and storage system, identified as EU-12, installed in1997, consisting of the following equipment:

(1) One (1) unloading hopper, equipped with **baghouse using** fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.

(2) One (1) conveyor and bucket elevator, equipped with **baghouse using** baghouse using fabric filters for particulate matter control exhausting to Stack S-111, capacity: 196 tons of corn per hour.

(3) One (1) storage silo, equipped with **baghouse using** fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 75,000 bushels of corn.

(4) One (1) grain cleaner, equipped with **baghouse using** fabric filters for particulate matter control, exhausting to Stack S-111, capacity: 26.6 tons of corn per hour.

(5) One (1) grain transport system, equipped with **baghouse using** fabric filters for particulate matter control, exhausting to Stack S-112, capacity: 26.6 tons of corn per hour.

(c) Seven (7) storage bins, collectively identified as EU-13, installed prior to 1950, equipped with **baghouse using** fabric filters for particulate matter control, exhausting inside, five (5) with a capacity of 8,000 bushels, each and two (2) with a capacity of 4,000 bushels, each.

(d) Six (6) hammermills **and hopper**, collectively identified as EU-14, installed prior to 1950, equipped with a baghouse for particulate matter control, exhausting inside, capacity: 109,760 pounds of grain per hour, total.

***

(f) EU-21, consisting of the following units:

(1) Three (3) open fermenters, installed prior to 1950, exhausting to Stack S-201, capacity: 25,300 gallons, each.

(2) Five (5) open fermenters, installed in 2004, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(3) Three (3) open fermenters, installed in 2005, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(4) Three (3) open fermenters, installed in 2006, exhausting to Stack S-201, capacity: 27,854 gallons, each.
Under NSPS, Subpart VV, the pumps, compressors, pressure relief devices in gas/vapor service, sampling connection systems, open-ended valves or lines, and valves of five (5) open fermenters, six (6) open fermenters and are considered to be affected facilities.

***

(p) One (1) DDG (Distillers Dried Grain) loadout system, installed in 1997, consisting of the following:

***

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate [326 IAC 6-3-2]

***

Emission Unit (baghouse)	Unit Description	Process weight rate (tons per hour)	Allowable particulate emission rate (pounds per hour)
EU-11	**grain receiving and** Pneumatic Conveyor	28.0	38.2
EU-12	Corn receiving and storage system	446	67.6
EU-13	Grain Storage Bins	224	59.7
EU-14	Hammermills **and hopper**	54.9	45.4
EU-32	Rotary dryers, cooler and transport system	53.8	45.3
EU-34	Storage silos and surge hoppers	21.0	31.5
EU-35	Air transport system and scale to rail car loading area	7.00	15.1
EU-36	Air transport system and scale to the truck loading area	7.00	15.1
EU-37	Rail Loading	7.00	15.1
EU-38	Truck Loading	7.00	15.1

***

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.1.~~3~~**4** Particulate Control [326 IAC 2-7-6(6)]

D.1.4**5** Visible Emissions Notations

***

(e) ~~If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.~~
If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with EU-12, at least once per day when this process is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 3.0 and 9.0 inches of water unless a different upper-bound or lower bound value for this range is determined during the latest stack test Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure drop shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once annually or as established by the manufacturer's specifications whichever is more frequent.

D.1.~~5~~**7** Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) ~~The Permittee shall record the pressure drop across the baghouses used in conjunction with EU-12 and EU-34 through EU-36 at least once per day when the emissions units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 5.5 inches of water for EU-12 and EU-34 through EU-36, or until a new range is established during the latest stack test, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.~~

(b) ~~The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.~~

The Permittee shall record the pressure drop across the baghouses used in conjunction with EU-12 and EU-34 through EU-36, at least once per day when this process is in

operation. When for any one reading, the pressure drop across the scrubber is outside the normal range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 3.0 and 9.0 inches of water unless a different upper-bound or lower bound value for this range is determined during the latest stack test Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure **drop** shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once ~~every six (6) months~~ **annually or as established by the manufacturer's specifications whichever is more frequent**.

~~D.1.6 Baghouse Inspections~~

~~An inspection shall be performed semi-annually of all bags controlling EU-12. All defective bags shall be replaced.~~

D.1.~~7~~8 Broken or Failed Bag Detection - Multi-Compartment Baghouse

***

D.1.8**9** Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4**5**, the Permittee shall maintain a daily record of visible emission notations of the grain processing facilities stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the grain processing facilities did not operate that day).

(b) To document the compliance status with Condition D.1.5**6 and D.1.7**, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the grain processing facilities. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the grain processing facilities did not operate that day).

~~(c) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6. The Permittee shall include in its daily record when an inspection is not performed and the reason for a lack of inspection (e.g., the process did not operate during the semi-annual period).~~

(~~d~~**c**) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

The D.2 Section of the permit has been revised as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]: Steam Boiler, identified as EU-96

(ff) One (1) steam boiler, identified as EU-96, installed in 1977, using ~~coal-based alternative fuels (CBAF), coal,~~ natural gas~~, #6 fuel oil, and/or wood, equipped with an electrostatic precipitator for particulate matter control~~, exhausting to Stack S-906, heat input capacity:244 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6.5-3]

~~Pursuant to 326 IAC 6.5-3-8 (Particulate Matter Emissions for Dearborn County),~~ **The steam boiler, identified as EU-96 (identified as Boiler 6), shall burn natural gas only.**

Pursuant to 326 IAC 6.5-1-1(b), particulate limitations shall not be established for combustion units that burn only natural gas. Therefore, the limitations established in 326 IAC 6.5-3-8 for Boiler 6 shall not apply.

~~(a) The PM emissions shall be limited 0.180 pounds of PM per million British thermal units.~~

~~(b) The PM emissions shall be limited to two hundred fourteen and two-tenths (214.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

~~(c) The throughput to the steam boiler, identified as EU-96, shall be limited to 85,096 tons of coal per twelve (12) consecutive month period with compliance determined at the end of each month.~~

~~(d) The minimum overall PM control efficiency for the electrostatic precipitator on this boiler shall not be less than 94.4% to comply with this limit when firing coal, CBAF or wood. For purposes of showing compliance with this fuel limit, the following equivalencies shall be used:~~

~~(1) One (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal,~~

~~(2) One (1) kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and~~

~~(3) One (1) ton of wood is equivalent to 0.056 tons of coal.~~

~~D.2.2 Sulfur Dioxide (SO_2) [326 IAC 7-4-13]~~

~~Pursuant to 326 IAC 7-4-13 (Dearborn County sulfur dioxide emissions limitations), the SO_2 emissions from the steam boiler, identified as EU-96, shall not exceed 1.92 pounds per million British thermal units heat input while combusting coal and/or No. 6 fuel oil.~~

~~**Compliance Determination Requirements**~~

~~D.2.3 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]~~

~~Pursuant to 326 IAC 7-4-13, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed 1.92 pounds per mmBtu. Compliance shall be determined utilizing (a) or (b) below for coal firing or (c), (d), or (e) for fuel oil firing:~~

~~(a) Sampling and analyzing the coal using one of the following procedures:~~

~~(1) Minimum Coal Sampling Requirements and Analysis Methods:~~

~~(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;~~

~~(B) Coal shall be sampled at least one (1) time per day;~~

~~(C) Minimum sample size shall be five hundred (500) grams;~~

~~(D) Samples shall be composited and analyzed at the end of each calendar quarter;~~

~~(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or~~

~~(2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or~~

~~(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) above. [326 IAC 7-2-1(b)]~~

~~A determination of noncompliance pursuant to any of the methods specified in (a) and (b) above shall not be refuted by evidence of compliance pursuant to the other method.~~

~~(c) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or~~

~~(d) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.~~

~~(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted.~~

~~(2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.~~

~~(e) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the one (1) steam boiler, identified as EU-96, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.~~

~~A determination of noncompliance pursuant to any of the methods specified in (c) or (d) above shall not be refuted by evidence of compliance pursuant to the other method.~~

~~D.2.4 Testing Requirements [326 IAC 2-7-6(1,6)] [326 IAC 2-1.1-11]~~

~~In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM testing of the steam boiler, identified as EU-96, utilizing methods as approved by the Commissioner at~~

~~least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

~~D.2.5 Particulate Control [326 IAC 2-7-6(6)]~~

~~In order to ensure compliance with Condition D.2.1, the electrostatic precipitator for particulate control shall be in operation and control emissions from the steam boiler, identified as EU-96, at all times that the boiler is in operation and is firing coal, CBAF, or wood.~~

Compliance Assurance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]

~~D.2.6 Continuous Opacity Monitors~~

~~Pursuant to 326 IAC 5-1-2 and 326 IAC 5-1-3, opacity from EU-96 shall comply with the following requirements:~~

~~(a) The Permittee shall continuously operate the opacity monitoring devices on EU-96, in accordance with the requirements of Condition D.2.7 to ensure compliance with the opacity limits of Condition C.1 (Opacity).~~

~~(b) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period.~~

~~(c) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.~~

~~(d) When building a new fire in a boiler, or shutting down a boiler, capacity may exceed the applicable limit; however, opacity levels shall not exceed sixty percent (60%) for any six (6) minute averaging period. Opacity in excess of the applicable limit shall not continue for more than two (2) six (6) minute averaging periods in any twenty-four (24) hour period.~~

~~(e) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes or the airheater, opacity may exceed the applicable opacity limit; however, opacity shall not exceed sixty percent (60%) for any six (6) minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6) minute averaging period in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6) minute averaging periods in a twelve (12) hour period.~~

~~D.2.7 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

~~(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COMS shall be in operation at all times that the induced draft fan is in operation except when firing natural gas.~~

~~(b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.~~

~~(c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~

(d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.

(1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

(2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.

(3) Method 9 readings may be discontinued once a COMS is online.

(4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.

(5) Method 9 readings will not be required if the unit is firing natural gas while a COMS is offline.

(e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60.

D.2.8 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) In the event of emissions exceeding twenty percent (20%) average opacity for three (3) consecutive six (6) minute averaging periods, the Permittee shall take a reasonalbe response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Opacity readings in excess of twenty percent (20%) for three (3) consecutive six (6) minute averaging periods but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.

(b) The Permittee may request that the IDEM, OAQ approve a different opacity trigger level than the one specified in (a) of this condition, provided the Permittee can demonstrate, through stack testing or other appropriate means, that a different opacity trigger level is appropriate for monitoring compliance with the applicable particulate matter mass emission limits.

D.2.9 Parametric Monitoring

(a) The ability of the electrostatic precipitator to control particulate emissions shall be monitored once per day, when the unit is in operation, by measuring and recording the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.

(b) When for any one reading, operation is outside one of the normal ranges shown below, or until a new range is established during the latest stack test, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. A reading outside of the above mentioned ranges is not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this

~~permit.~~

~~(1) Primary voltage: 70-385 V~~

~~(2) Secondary voltage: 10-55 kV~~

~~(3) T-R set primary current: 15-150 A~~

~~(c) The instrument used for determining the T-R set voltage shall be subject to approval by IDEM, OAQ.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.2.10 Record Keeping Requirements~~

~~(a) To document the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO_2 emission limits established in Conditions D.2.1 and D.2.2.~~

~~(1) Calendar dates covered in the compliance determination period;~~

~~(2) Actual coal usage since last compliance determination period;~~

~~(3) Sulfur content, heat content, and ash content; and;~~

~~(4) Sulfur dioxide emission rates.~~

~~(b) To document the compliance status with Conditions D.2.6, D.2.7, and D.2.8, the Permittee shall maintain records of the continuous opacity monitor for the steam boiler, identified as EU-96, stack exhaust while combusting coal-based alternative fuel (CBAF), No. 6 fuel oil, or wood.~~

~~(c) To document the compliance status with Condition D.2.9, the Permittee shall maintain records of the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.~~

~~(d) Section C - General Record Keeping Requirements contains the Permittee's obligation~~ with regard to the records required by this condition.

~~D.2.11 Reporting Requirements~~

~~A quarterly summary of the information to document the compliance status with Condition D.2.1(b) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).~~

The D.3 Section of the permit has been revised as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Emission Unit Description: Steam Boiler EU-97

(cc) One (1) natural gas fired steam boiler, identified as EU-97, using #2 fuel oil as back-up, installed

in 1992, exhausting to Stack S-907, heat input capacity: 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using #2 fuel oil. Under 40 CFR 60, Subpart Dc, this facility is considered an industrial, institutional, or commercial boiler.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

EMISSION UNIT	UNIT ID	PT (LB/MMBTU)
Boiler	**EU-96**	**0.25**
Boiler	**EU-97**	**0.40**

*** Boiler EU-96 was modified in 2013 to burn natural gas only.**

D.3.2 Fuel Oil Limit [326 IAC 2-2] [326 IAC 7-1.1-2]

***

Compliance with these limitations shall limit the SO_2 emissions from the steam boiler, identified as EU-97, to 39.9**4** tons per year, and render the requirements of 326 IAC 2-2, PSD, not applicable. This will also satisfy the requirements of 326 IAC 7-1.1-2, Sulfur Dioxide Emissions Limitations.

D.3.4 Visible Emissions Notations

***

(e) ~~If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.~~

If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.3.6 Reporting Requirements

~~A quarterly summary of the information to document the compliance status with Condition D.3.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reports required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).~~
The Permittee shall submit a quarterly summary of the information to document the compliance status with Condition D.3.2. These reports shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The D.4 Section of the permit has been revised as follows:

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

~~(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour [326 IAC 6-3-2].~~

~~(b) Three (3) natural gas fired boilers with a heat input of capacity of 4.2 mmBTU/hr each.~~

~~(b~~c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the ~~natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour and~~ grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations shall be limited by the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

~~D.4.2 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-4]~~

~~Pursuant to 326 IAC 6-2-4, the three natural gas fired boilers shall be limited to 0.38 pounds per MMBtu.~~

~~$Pt = \frac{1.09}{Q^{0.26}}$~~

~~where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input~~
~~Q = Total source maximum operating capacity rating in MMBtu/hr heat input.~~

~~Total maximum operating capacity is 47.6 MMBtu/hr (Steam boiler EU-97 when burning natural gas). Total maximum operating capacity of the Steam boiler (EU-97 and three natural gas fired boilers) is 60.2 MMBtu/hr.~~

Section E.2 through E.5 have been added for applicable Federal Rules:

SECTION E.2 FACILITY OPERATION CONDITIONS - 40 CFR 60, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

Emission Unit Description:

(f) EU-21, consisting of the following units:

(2) Five (5) open fermenters, installed in 2004, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(3) Three (3) open fermenters, installed in 2005, exhausting to Stack S-201, capacity: 27,854 gallons, each.

(4) Three (3) open fermenters, installed in 2006, exhausting to Stack S-201, capacity: 27,854 gallons, each.

Under NSPS, Subpart VV, the pumps, compressors, pressure relief devices in gas/vapor service, sampling connection systems, open-ended valves or lines, and valves of five (5) open fermenters, six (6) open fermenters and are considered to be affected facilities.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

E.2.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR 60, Subpart A]

The Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12, for the sources of equipment leaks of VOC, as specified in 40 CFR 60, Subpart VV in accordance with the schedule in 40 CFR 60, Subpart VV.

E.2.2 Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006 [40 CFR 60, Subpart VV] [326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart VV (included as Attachment B) which are incorporated by reference as 326 IAC 12 for the sources of equipment leaks of VOC:

(1) 40 CFR 60.480
(2) 40 CFR 60.481
(3) 40 CFR 60.483-1
(4) 40 CFR 60.483-2
(5) 40 CFR 60.484
(6) 40 CFR 60.485
(7) 40 CFR 60.486
(8) 40 CFR 60.487
(9) 40 CFR 60.488
(10) 40 CFR 60.489

SECTION E.3 FACILITY OPERATION CONDITIONS – 40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Emissions Unit Description: Reciprocating Internal Combustion Engine (RICE)

(b) Emergency generators as follows: diesel generators not exceeding 1,600 horsepower.

(1) One (1) Diesel-fired emergency generator, with a maximum capacity of 1600 hp and installed in 1999. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(c) Other emergency equipment as follows: stationary fire pumps.

(1) One (1) Diesel-fired emergency fire water pump with a maximum capacity of 235 horsepower and installed in 1996. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(f) Activities associated with emergencies, including natural gas reciprocating engines not exceeding 16,000 horsepower.

(1) One (1) Natural gas-fired emergency generator, with a maximum capacity of 0.121 MMBtu/hr and installed in 2005. [326 IAC 2-2]

Under 40 CFR Part 63, Subpart ZZZZ, this generator is an affected unit.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements

E.3.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.6580, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the reciprocating internal combustion engines as specified in 40 CFR Part 63, Subpart ZZZZ in accordance with the schedule in 40 CFR 63, Subpart ZZZZ.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

**Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

E.3.2 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment C) which are incorporated by reference as 326 IAC 20-82 for the reciprocating internal combustion engines:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(a),(b)
(3) 40 CFR 63.6590(a)(1)(i),(ii),(b)(3)
(4) 40 CFR 63.6595
(5) 40 CFR 63.6600
(6) 40 CFR 63.6602
(7) 40 CFR 63.6604
(8) 40 CFR 63.6605
(9) 40 CFR 63.6610
(10) 40 CFR 63.6625(e)(1),(f),(h),(i)
(11) 40 CFR 63.6640 (f)(2)
(12) 40 CFR 63.6645(a)
(13) 40 CFR 63.6655 except (c)
(14) 40 CFR 63.6670
(15) 40 CFR 63.6675
(16) Table 1b
(17) Table 2b
(18) Table 6
(19) Table 8

SECTION E.4 National Emission Standards for Hazardous Air Pollutants (NESHAP) [326 IAC 2-7-5(1)][326 IAC 20-1][40 CFR 63, Subpart DDDDD]

Emissions Unit Description:

(bb) One (1) steam boiler, identified as EU-96, installed 1977, using natural gas and exhausting to Stack S-906, heat input capacity: 244 million British thermal units per hour.

Under 40 CFR 63, Subpart DDDDD, this facility is an affected unit.

(cc) One (1) natural gas fired steam boiler, identified as EU-97, using #2 fuel oil as back-up, installed in 1992, exhausting to Stack S-907, heat input capacity: 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using #2 fuel oil.

Under 40 CFR 60, Subpart Dc, this facility is considered an industrial, institutional, or commercial boiler. Under 40 CFR 63, Subpart DDDDD, this facility is an affected unit.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

E.4.1 General Provision Relating to New Source Performance Standards [326 IAC 20] [40 CFR 63, Subpart A]{ TC "D.1.8 Testing Requirements [326 IAC 2-1.1-11] " \f C \n \l "3" }

Pursuant to 40 CFR 63, the Permittee shall comply with the provisions of 40 CFR Part 63 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1 for the natural gas fired boilers identified as EU-96 and EU-97 except as otherwise specified in 40 CFR 63 Subpart DDDDD.

E.4.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters [326 IAC 20] [40 CFR 63 Subpart DDDDD]{ TC "D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12] " \f C \n \l "3" }

Pursuant to 40 CFR 63 Subpart DDDDD (included as Attachment D of this permit), the Permittee shall comply with the provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters, Subpart DDDDD for the natural gas fired boilers identified as EU-96 and EU-97 as specified as follows:

(1) 63.7480
(2) 63.7485
(3) 63.7490 (a)(1), (d)
(4) 63.7495 (b). (d)
(5) 63.7499 (l). (m)
(6) 63.7500 (a)(1)
(7) 63.7505 (a), (h)
(8) 63.7540 (a)(10), (c)(13)
(9) 63.7545
(10) 63.7550
(11) 63.7555
(12) 63.7560
(13) 63.7565
(14) 63.7570
(15) 63.7575
(16) Table 2
(17) Table 3
(18) Table 9
(19) Table 10

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 16, 2012.

Conclusion

The operation of this distilled spirits production source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T029-32119-00005.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Teresa Freeman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-1243 or toll free at 1-800-451-6027 extension (4-1243).

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov